



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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May 14, 2007

Ref: EPR-N

Michael D. Lloyd, District Ranger
Hell Canyon Ranger District
Black Hills National Forest
330 Mount Rushmore Road
Custer, SD 57730

Re: Norwood Project – Draft
Environmental Impact Statement
CEQ# 20070116

Dear Mr. Lloyd:

The U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the *Draft Environmental Impact Statement* (DEIS) for the Norwood Project on the Black Hills National Forest (BHNF). We offer the following comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4231, et. seq., and EPA's authority under Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

The United States Forest Service (USFS) proposes to implement multiple resource management actions within the Norwood project area as directed by the Black Hills National Forest Land and Resource Management Plan (Forest Plan). The focus of the proposed project is to enhance vegetative diversity, reduce the risk of mountain pine beetle infestation and large-scale wildfire, provide for wildlife habitat needs and provide a sustainable supply of commercial timber. The project area is located along approximately 22 miles of the Wyoming and South Dakota border in Pennington County, SD and Weston and Crook Counties in Wyoming.

EPA supports the proposed project's stated purpose and need to enhance vegetative diversity, reduce risk of mountain pine beetle infestation and large-scale wildfire, provide for wildlife habitat needs and provide a sustainable supply of commercial timber. The Forest Service identified three significant issues that influenced the development of alternatives to the Proposed Action: aspen restoration, ponderosa pine structural diversity and mountain pine beetle risk.

The DEIS presents four alternatives, including the no action alternative and proposed

action alternatives, in response to the significant issues identified. Alternative 2 is the proposed action and includes approximately 7,576 acres of commercial thinning to reduce stand density and promote forest health. The target density, measured as basal area in square feet per acre, varies from 50 to 70 depending on the level of risk for mountain pine beetle (MPB) infestation and proximity to MPB activity. Other commercial treatments include seedcut regeneration harvest on 1,907 acres and hardwood conversion on 180 acres that are currently designated as pine (approximately five of those acres are birch and the remaining 175 acres are aspen). This would result in an eight percent increase in aspen and a 20 percent increase in birch stands in the project area. This alternative would commercially harvest approximately 35.9 mmbf of sawtimber and 15,600 ccf of products other than logs (POL) from approximately 14,231 acres.

In general, the DEIS offers a thorough description of the project's impacts and how those impacts will be mitigated. Our primary concerns have to do with impacts to water quality from new and existing roads, a lack of specificity regarding impacts to wetlands, impacts from noxious and invasive weeds, and impacts to wildlife habitat. The DEIS also does not include any information about how and/or if the Norwood Project will utilize the cellulosic ethanol plant that is under construction in Upton, SD. The pilot plant is designed to produce one million gallons of fuel a year and could lead to a plant that would eventually produce as much as 20 million gallons of the fuel each year, using wood chips and wood residue as base material. According to BHNF Renewable Resources Staff Officer Dave Thom, the plant will accept slash and small diameter trees from private forest land around Upton, and will haul some wood from slash piles (tree tops and processor piles) from BHNF. The EIS should discuss whether and/or how this project will make use of this new facility.

EPA evaluates the potential effects of proposed actions and the adequacy of the information in the DEIS. We rate this DEIS an "EC-2" (environmental concerns, insufficient information) under EPA's enclosed ratings criteria. The EC rating indicates that the reviewer has identified environmental impacts that should be avoided in order to adequately protect the environment. These are described in the attached comments. We also recommend additional analysis and information to fully assess and mitigate all potential impacts of the management actions.

EPA appreciates the opportunity to review and comment on the DEIS and your willingness to consider our comments at this stage of your planning process. If you would like to discuss our comments, please feel free to contact Jody Ostendorf of my staff at (303) 312-7814.

Sincerely,

/s/ Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation